

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, WA 98101

October 24, 2007

Reply To

Attn Of: ETPA-088 Ref: 01-011-AFS

Jane Cottrell, Forest Supervisor Nez Perce National Forest 1004 Airport Road Grangeville, ID 83530

Dear Ms. Cottrell:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Supplemental Environmental Impact Statement (SEIS) for the **Meadow Face Stewardship Pilot Project** (CEQ# 20070390) on the Nez Perce National Forest, Clearwater Ranger District in Idaho County, ID. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 directs EPA to review and comment in writing on environmental impacts associated with all major federal actions.

The draft SEIS evaluates the potential cumulative effects associated with the proposed project, which was initiated to improve aquatic and terrestrial vegetation conditions within the project area. The results of this evaluation would help the Forest Service (FS) to decide whether to continue with implementation of Alternative 4B as originally selected in the project's Record of Decision (ROD) issued in February 2003 and summarized in the SEIS (p. 5) or whether to modify or terminate its implementation. The ROD also identified aquatic, soil, vegetation, and transportation resources as having been adversely impacted by past forest treatments and therefore needing management actions to bring them to desired conditions. Timber harvesting and grazing activities were considered most likely to have adversely affected forest resources and local environment.

The draft SEIS document includes a good analysis of cumulative effects of past, present, and reasonably foreseeable future projects within the Meadow Face area and the South Fork Clearwater River Subbasin on all resources expected to be impacted by this project, including a discussion of this project's contribution. The draft SEIS indicates that the FS conducted the cumulative effects analysis using the best available science, technical expertise, and information from public comments on the project. The results show what cumulative impacts would be expected at both temporal and spatial extents. The document also includes discussion of mitigation measures to offset the impacts and monitor the effectiveness.

We support the decision to reduce timber harvesting intensity by excluding 1,545 acres from the originally proposed harvest area of 3,915 acres. As a result of that, no logging would occur in Unit 4 (nearly 710 acres) of the forest, areas prone to landslide and erosion hazards, and vulnerable wetlands and stream zones. Logging systems would also be changed to include more helicopter, cable and skyline than tractor logging, as well as restoration of disturbed areas. Silvicultural and grazing prescriptions would include group selection and shelterwood harvests, grazing exclosures, fences (drift and riding), water supply, and stocking rates to reduce impacts to resources. In addition, restoration projects would be implemented, including decommissioning and re-contouring of roads in riparian zones, tree and shrub planting in riparian and streambank areas, prescribed burning, scarification and soil cover with slash, and retention of large wood trees in the forest and debris in streams.

Based on our review, we have assigned a rating of LO (Lack of Objections) to the selected Alternative Action i.e., 4B-Modified. This rating and a summary of our comments will be published in the *Federal Register*. For your reference, a copy of our rating system used in conducting our review is enclosed.

EPA appreciates the opportunity to provide comments on the draft SEIS for the proposed action. If you have questions about our comments, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,

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Christine B. Reichgott, Manager NEPA Review Unit

Enclosure

cc: Idaho Operations Office Nez Perce Tribe